

# SHER TREMONTE LLP

May 26, 2017

**BY ECF**

Hon. Gregory H. Woods  
United States District Court  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 2260  
New York, New York 10007

**Re:** *Tatintian et al. v. Vorotyntsev et al.*, Case No. 16-cv-7203  
*Khmaladze et al. v. Vorotyntsev et al.*, Case No. 16-cv-8029

Dear Judge Woods:

We represent Defendants Mikhail Vorotyntsev and Elena Vorotyntsev in the above-referenced matters. We write to seek a pre-motion teleconference concerning our anticipated motion to withdraw as counsel for Mikhail Vorotyntsev and Elena Vorotyntsev and our request that upcoming deadlines and all proceedings in the above-referenced matters be adjourned until Mikhail Vorotyntsev and Elena Vorotyntsev have an opportunity to hire replacement counsel.

This firm cannot continue to provide Mikhail Vorotyntsev and Elena Vorotyntsev with legal services because of their non-payment of necessary fees and expenses. However, Mikhail Vorotyntsev and Elena Vorotyntsev have yet to hire replacement counsel. Meanwhile, there is an upcoming deadline of June 2, 2017 for Mikhail Vorotyntsev to file his opposition to Plaintiff Tatintian's Motion to Dismiss his Counterclaims.

To ensure that our clients' interests are protected, we respectfully request that the Court adjourn the aforementioned deadline. In addition, in the event the Court grants leave to Sher Tremonte LLP to withdraw as counsel, we respectfully request that all proceedings be stayed for 30 days to allow Mikhail Vorotyntsev and Elena Vorotyntsev sufficient time to hire replacement counsel.

We note that, on consent motion of all parties, this Court has already granted a stay of all discovery in these actions pending the resolution of several potentially dispositive motions. (No. 16-cv-7203, Dkt. Nos. 149-150; No. 16-cv-8029, Dkt. No. 57.) For this reason, no party should suffer any prejudice as a result of this application.

The Hon. Gregory W. Woods

May 26, 2017

Page 2 of 2

Should the Court require additional information concerning the basis for withdrawal, we respectfully request leave to make an *in camera* submission to protect client confidentiality. We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Justin M. Sher

Justin M. Sher  
Erica A. Wolff

cc: Counsel of Record (by ECF)